

Principles of Personal Data Protection

Limited liability company **DIVR LABS s.r.o.**, business ID: 05214378, registered seat: Thámova 166/18, Karlín, 186 00 Prague 8, Commercial Register file no: C 260130, maintained by the Municipal Court in Prague (Hereinafter also “**We**“ or “**Our Company**“) pays a lot of attention to personal data protection. This document will inform you how we process your personal data, i.e. personal data of our customers and users of our services, whether we process them on the basis of the data subject’s consent or on the basis of another legal reason, for what purpose we use the data, whom we transfer them to and what your rights are in connection with your personal data processing.

These principles are formulated in compliance with the data processing legislation, including but not limited to the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter “**GDPR**“)

1. Initial Provisions and Terms and Definitions

- 1.1. Our company operates the www.golemvr.com web site and you enter this web site as its user, or if you are interested in products, services or information offered/provided by our company.
- 1.2. As you provide your personal data to us we are your personal data **controller**.
- 1.3. The terms "**Controller**", "**Processor**", "**Personal Data**" and "**Processing**" used herein shall be understood in the context of the GDPR:
 - 1.3.1. **Controller** in the sense of Art. 4 (7) of GDPR means a natural person or legal entity, a public authority, an agency or another entity alone or together with others specifying the purpose and means of personal data processing.
 - 1.3.2. **Processor** in the sense of Art. 4 (8) of GDPR means a natural person or legal entity, a public authority, an agency or another entity processing personal data for a Controller.
 - 1.3.3. **Personal Data** mean any information about an identified or identifiable natural person (the data subject).
 - 1.3.4. **Personal Data Processing** in the sense of Art. 4 (2) of GDPR means any operation or a set of operations with personal data or personal data files performed

with /without the help of automated procedures such as collection, recording, sorting, structuring, storage, adaptation or amendment, retrieval, consultation, use, accessibility facilitation by transfer, dissemination or any other disclosure, listing or combination, limitation, deletion or destruction.

2. What is the purpose of your personal data processing?

2.1. We only process your personal data for purposes notified to you by our company. The type of personal data we process and the purposes of the processing depend on how you communicated your personal data to us. You can communicate your personal data to us as follows:

2.1.1. When you visit our web site

When you visit our web site www.golemvr.com, we process some of your personal data automatically within the scope, for the purpose and for the period and on the basis of the legal reason (title) specified below:

Purpose	Scope of processed data	Legal title	Processing period
Improvement of our web site	Data on your web navigation (through cookies)	Legitimate interest of our company in improvement of our web site	For 2 weeks
Compilation of statistics and reports on the use of our web site	Data on your web navigation (through cookies)	Legitimate interest of our company in measurement of effectiveness of our web site, including advertising on the site	For 2 weeks

You are entitled to object against our processing of your personal data for the purpose of fulfillment of our legitimate interest in improvement and measurement of effectiveness of our web site. Unless we have legitimate reasons for continuing your personal data processing despite your objection we will stop processing your personal data for this purpose.

2.1.2. When you communicate with us via various channels

If you communicate with us by means of various channels, especially by asking a question via our web site, email, chat instruments or social media. Then we process your personal data within the scope, for the purpose and for the legal reason (title) specified below:

Purpose	Scope of processed data	Legal title	Processing period
Recording and settlement of your requests, confirmation that we have accepted and settled your requirement.	Name, surname, e-mail contact, records of your requirement(s) and the related communication	Our legitimate interest is to keep contact with you	For the period of duration of our legitimate interest, maximum for 3 years from the last communication with you

You can file an objection against this processing on the basis of our legitimate interest (see Art. 4.9.8.).

2.1.3. In the context of acquisition and use of admission tickets and vouchers for GOLEM VR

By filling out the order form on our web site www.golemvr.com you disclose your personal data to us for the purpose of our settlement of your order. Then we process your personal data within the scope, for the purpose and for the legal reason (title) specified below:

Purpose	Scope of processed data	Legal title	Processing period	
Order settlement, including goods delivery and payment (including but not limited to admission tickets or vouchers for GOLEM VR)	Name, surname, e-mail and account number (disclosed by you for the purpose of purchase price refund in case of your withdrawal from the voucher purchase contract)	Necessary for the contract implementation	Name, surname, e-mail and account number	In 3 years from our legal relationship termination (goods delivery and purchase price payment)
			Basic data on the legal relationship and its existence (name, surname, e-mail contact)	For 10 years from the contract termination

If you decide to order anything from us these data will be necessary for us to be able to settle your order, to execute a contract with you for the purpose of the goods or service provision to you, and to implement the executed contract for you.

2.1.4. When you are addressed with our offers of products and services, including tailor-made offers according to your preferences

We want to keep further contact with you. Then we process your personal data within the scope, for the purpose and for the legal reason (title) specified below:

Purpose	Scope of processed data	Legal title	Processing period
When you are addressed with our offers of products and services,	Name, surname, e-mail and order history	Our legitimate interest is to keep contact with you and offer you	For the period of duration of our legitimate interest, maximum for 3 years from your last order

including tailor-made offers according to your preferences		products and services tailored to your needs	
--	--	--	--

As for addressing you with our offers of our products and services, including offers tailored to your preferences, we will be happy to be in continued contact with you. So as not to send you offers of no interest for you we use information from our records of your requirements and past communications with us.

At the same time we do not want to bother you with this and that is why you can use the procedure described below or every e-mail sent to you for exclusion of further sending our commercial information to you (see Art. 4.9.).

You can object against our processing your personal data for the purpose of delivery of our commercial communications to you on the basis of which we will stop this processing of your personal data for this purpose immediately.

3. Who we forward your personal data to?

3.1. We do not know to whom we may provide your personal data in future. That is why we list here categories of potential recipients with justification why they may be provided with your personal data processed by us:

Recipient	Reason for provision
Entities operating payment systems for the purpose of payment implementation, especially in the case of card payment	Necessary for the contract implementation
Our accountant and tax accountant	We need a provider of accounting and tax services to us as a data processor to keep our accounts and fulfill our tax liabilities for us
An entity assuring our web site run, our applications and our software functioning (computer systems) including persons providing cloud services	We need the entity as a data processor to provide to us software equipment, to perform servicing of our web site and to assure operation of our information systems
A person assuring our direct e-mailing	We may authorize a third party to disseminate our e-mail information and we may provide your e-mail address to this person for that purpose

3.2. We would like to inform you that we will always provide you information about to whom and for what purpose we provide your personal data in this context on your request.

4. What are your rights?

4.1. Since our company processes your personal data, you are endowed with certain rights which this section wants to inform you about. You can ally your rights with us in any manner convenient for you and allowing us to check whether it is you who applies (to check your identity). Then we will try our best to satisfy you. In order to be able to meet your requests as completely as we can we would like to ask you to apply your rights in writing on e-mail address bookings@golemvr.com.

4.2. Right for consent withdrawal - we process some of your personal data on the basis of your consent. You are entitled to withdraw your consent with your personal data processing, including your consent with commercial information receipt. You can withdraw your consent on bookings@golemvr.com.

As for processing of your personal data for the purpose of commercial information distribution you can withdraw your consent with your data processing for that purpose simply by clicking on the relevant link at the end of every commercial information e-mail sent to you or change your user profile setting.

4.3. Right of access - you are entitled for access to your personal data processed about you by us and for information what personal data we process about you, for how long, for what purpose, for what recipients, and whether we use them for automated decision-making (including how this automated decision-making works).

We will provide a copy of your processed personal data free of charge to you. In the case of a request for more copies we will ask for their payment.

4.4. Right for correction - if you find out that your personal data processed by us are incorrect or incomplete, you are entitled to ask for their correction or completion if required by the purpose of their processing.

4.5. Right for deletion - You are also entitled to ask for deletion of your personal data our company processes and saves about you. The request for deletion must be justified by one of the following reasons:

- Your personal data are no longer needed for the purpose for which they were obtained and processed;
- Your personal data are processed illegally by our company;
- You have withdrawn your consent with your personal data processing and we have no other authorization (legal title) to continue to do so;

- You file an objection against your personal data processing for the purpose of direct marketing (direct mail);
- The file an objection against your personal data processing on the basis of our legitimate interest which we are unable to prove to govern over your right for data deletion;
- There is a legal reason for your personal data deletion;
- Our company processes personal data of a child without its parents' consent.

We would like to note that there are situations when your personal data cannot be deleted on your request or after withdrawal of your consent with their processing This is mainly when continued processing of your personal data is required by law. When this happens our company will inform you about the reason why your personal data cannot be deleted despite your explicit request for the deletion.

4.6. Right for portability - another right vested onto you is the right for the data portability.

On the basis of this right you can ask for provision of your personal data provided to us on the basis of your consent and processed by automated procedures by us. Your personal data meeting these conditions will be provided to you on request in the standard structured and machine-readable format, or forwarded to another controller of your choice on your request if technically feasible.

4.7. Right to limited processing - if you believe that your personal data processed by our company are incorrect, you can request limitation of our processing of your data for the minimum period necessary for review of accuracy of your personal data and their potential correction.

You are endowed with this right also in the following cases:

- Processing of your personal data by our company is illegal but you do not wish your personal data to be deleted;
- Our company no longer needs your personal data for the purpose for which they were provided but you insist on their processing (archiving) by our company for the purpose of specification, execution or defense of your claims;
- You have filed an objection against processing of your personal data on the basis of legitimate interest of our company. The limitation of processing for this reason will be limited for the period needed for specification whether our legitimate interest prevails over your right to withdraw from further processing of your data.

- 4.8. Right for complaint about processing of your personal data on the basis of a legitimate interest - as some of your personal data are processed on the basis of our legitimate interest, you are entitled to file an objection on the basis of which we will assess whether it is really our legitimate interest that prevails over your wish to have your personal data deleted or whether your right for immediate stop of your personal data processing prevails.
- 4.9. Right for objection against your personal data processing for the purpose of direct marketing - you are entitled to protest against processing of your personal data by our company for the purpose of direct marketing (for example for the purpose of commercial information sending). In such case our company will stop processing your personal data for that purpose.
- 4.10. Right for complaint - if all of the above rights are insufficient from your point of view, or if you believe that our company violates your rights you can file a complaint with the supervisory board. The complaint may be raised via the contact to the Personal Data Protection Office, available on <https://www.uoou.cz/podatelna-uradu/os-1006>.